

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

---

CHRISTINE SARACENI,

Plaintiff,

v.

Case No.: 19-CV-1152

M&T BANK CORPORATION,

Defendant.

---

**DECLARATION OF TYLER VERRALL**

I, Tyler Verrall, under penalty of perjury and pursuant to 28 U.S.C. § 1746,  
declare as follows:

1. I am a Digital Forensics Investigator in the Physical Security and Investigations Department for M&T Bank Corporation (“M&T”). I make this declaration to present facts relevant to the motions pending before this Court. This declaration is based on my personal knowledge, investigation, and my analysis of documents.

2. On or about July 25, 2019, the department was contacted by the Human Resources department because of concern that an employee who was leaving M&T may be taking bank documents. Specifically, Meghan Frank contacted the department to analyze the recent email traffic of Christine Saraceni.

3. On July 26, 2019, an investigation of Ms. Saraceni’s email was done. Five emails were identified as problematic:

Email Subject and Date	To	From	Attachment Title	Exhibit
Database July 24, 2019	<a href="mailto:cantinore27@gmail.com">cantinore27@gmail.com</a> <a href="mailto:jsaraceni@primelending.com">jsaraceni@primelending.com</a>	<a href="mailto:csaraceni@mtb.com">csaraceni@mtb.com</a>	Top firms Database for Mail merging – use this one.xlsx	A
Referral list July 24, 2019	<a href="mailto:cantinore27@gmail.com">cantinore27@gmail.com</a> <a href="mailto:jsaraceni@primelending.com">jsaraceni@primelending.com</a>	<a href="mailto:csaraceni@mtb.com">csaraceni@mtb.com</a>	Marketing List.xls	B
Marketing List July 24, 2019	<a href="mailto:jsaraceni@primelending.com">jsaraceni@primelending.com</a>	<a href="mailto:csaraceni@mtb.com">csaraceni@mtb.com</a>	Marketing List.xls	C
Emailing: address July 24, 2019	<a href="mailto:cantinore27@gmail.com">cantinore27@gmail.com</a>	<a href="mailto:csaraceni@mtb.com">csaraceni@mtb.com</a>	address.doc	D
Chairman's 2019 – June July 25, 2019	<a href="mailto:cantinore27@gmail.com">cantinore27@gmail.com</a>	<a href="mailto:csaraceni@mtb.com">csaraceni@mtb.com</a>	Copy of June Chairman's Club – Reverse.xlsx	E

4. These emails were located on M&T's computer system in the location of Ms. Saraceni's sent items. See attached as Exhibits A-E.

5. At the request of counsel, I reviewed the available data for these emails and attachments, and created reports generated by the tool EnCase. The reports are attached as Exhibit F.

6. The reports show the following information about the four unique attachments:

**Top firms Database for Mail merging — use this one.xlsx:**

This document was created by Ruth Deveronica (identified as EMTGRDZ) on January 22, 2010. It was last modified by Christine Saraceni on August 18, 2010. This was emailed to [jsaraceni@primelending.com](mailto:jsaraceni@primelending.com) and [cantinore27@gmail.com](mailto:cantinore27@gmail.com).

**Marketing List.xls:**

This document shows the author as M&T Bank. It was created on M&T's system on July 9, 2008. As set forth above in the table, this document was emailed out by Ms. Saraceni twice — once to [jsaraceni@primelending.com](mailto:jsaraceni@primelending.com) and once to both [jsaraceni@primelending.com](mailto:jsaraceni@primelending.com) and [cantinore27@gmail.com](mailto:cantinore27@gmail.com).

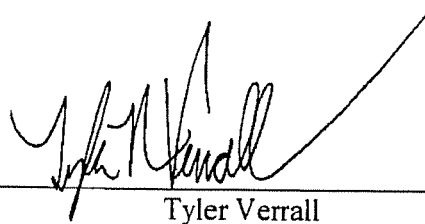
**Copy of June Chairman's Club — Reverse.xlsx:**

This document was created by Kenneth Sielski (identified as EMTGKJS) on July 25, 2012. It was last modified by Ms. Saraceni on July 25, 2019. This was emailed to [cantinore27@gmail.com](mailto:cantinore27@gmail.com).

**Address.doc:**

This document shows the author as M&T Bank. It was created and last modified on M&T's system on December 13, 2008.

Dated: October 8, 2019

  
Tyler Verrall

# **EXHIBIT A**

Message

**From:** Saraceni, Christine [/O=EXCHANGEPROD/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EMTGCSX]  
**Sent:** 7/24/2019 4:26:22 PM  
**To:** cantinore27@gmail.com  
**CC:** jsaraceni@primelending.com  
**Subject:** Database  
**Attachments:** Top firms Database for Mail merging--Use this one.xlsx

Chris Saraceni  
Banking Officer/M&T Bank  
Reverse Mortgage Specialist  
NY7-ROC6-Mailcode  
M&T Bank at 3 City Center  
Mortgage Division, Suite 600  
Rochester, NY 14604  
585-409-0392 Cell 855-718-6981 FAX  
NMLS# 474731



*Please click on the links below to learn more about M&T's Reverse Mortgage for seniors*

**Link to the M & T Reverse page:**

<https://www.mtb.com/mortgages-loans/mortgages/reverse-mortgages>

**Link for the M & T reverse video only:**

<https://www.mtb.com/mortgages-loans/mortgages/reverse-mortgages/reverse-mortgage-right-for-me>

"If you choose not to receive e-mail from M&T Bank, or its affiliates, please let me know by responding to this e-mail or notifying me in writing at the address listed above"

# Exhibit Subject to M&T's Motion to Seal

# **EXHIBIT B**

Message

---

**From:** Saraceni, Christine [/O=EXCHANGEPROD/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EMTGCSX]  
**Sent:** 7/24/2019 4:27:26 PM  
**To:** cantinore27@gmail.com  
**CC:** jsaraceni@primelending.com  
**Subject:** Referral List  
**Attachments:** Marketing List.xls

Chris Saraceni  
Banking Officer/M&T Bank  
Reverse Mortgage Specialist  
NY7-ROC6-Mailcode  
M&T Bank at 3 City Center  
Mortgage Division, Suite 600  
Rochester, NY 14604  
585-409-0392 Cell 855-718-6981 FAX  
NMLS# 474731



*Please click on the links below to learn more about M&T's Reverse Mortgage for seniors*

**Link to the M & T Reverse page:**

<https://www.mtb.com/mortgages-loans/mortgages/reverse-mortgages>

**Link for the M & T reverse video only:**

<https://www.mtb.com/mortgages-loans/mortgages/reverse-mortgages/reverse-mortgage-right-for-me>

"If you choose not to receive e-mail from M&T Bank, or its affiliates, please let me know by responding to this e-mail or notifying me in writing at the address listed above"



# Exhibit Subject to M&T's Motion to Seal

# **EXHIBIT C**

Message

**From:** Saraceni, Christine [/O=EXCHANGEPROD/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EMTGCSX]  
**Sent:** 7/24/2019 4:07:26 PM  
**To:** jsaraceni@primelending.com  
**Subject:** Marketing list  
**Attachments:** Marketing List.xls

Chris Saraceni  
Banking Officer/M&T Bank  
Reverse Mortgage Specialist  
NY7-ROC6-Mailcode  
M&T Bank at 3 City Center  
Mortgage Division, Suite 600  
Rochester, NY 14604  
585-409-0392 Cell 855-718-6981 FAX  
NMLS# 474731



*Please click on the links below to learn more about M&T's Reverse Mortgage for seniors*

**Link to the M & T Reverse page:**

<https://www.mtb.com/mortgages-loans/mortgages/reverse-mortgages>

**Link for the M & T reverse video only:**

<https://www.mtb.com/mortgages-loans/mortgages/reverse-mortgages/reverse-mortgage-right-for-me>

"If you choose not to receive e-mail from M&T Bank, or its affiliates, please let me know by responding to this e-mail or notifying me in writing at the address listed above"

# Exhibit Subject to M&T's Motion to Seal

# **EXHIBIT D**

Message

---

**From:** Saraceni, Christine [/O=EXCHANGEPROD/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EMTGCSX]  
**Sent:** 7/24/2019 4:49:49 PM  
**To:** cantinore27@gmail.com  
**Subject:** Emailing: address  
**Attachments:** address.doc

Your message is ready to be sent with the following file or link attachments:

address

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.

# Exhibit Subject to M&T's Motion to Seal

# **EXHIBIT E**



Message

**From:** Saraceni, Christine [/O=EXCHANGEPROD/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EMTGCSX]  
**Sent:** 7/25/2019 10:49:40 AM  
**To:** cantinore27@gmail.com  
**Subject:** Chairmans 2019-June  
**Attachments:** Copy of June Chairmans Club - Reverse.xlsx

Chris Saraceni  
Banking Officer/M&T Bank  
Reverse Mortgage Specialist  
NY7-ROC6-Mailcode  
M&T Bank at 3 City Center  
Mortgage Division, Suite 600  
Rochester, NY 14604  
585-409-0392 Cell 855-718-6981 FAX  
NMLS# 474731



*Please click on the links below to learn more about M&T's Reverse Mortgage for seniors*

**Link to the M & T Reverse page:**

<https://www.mtb.com/mortgages-loans/mortgages/reverse-mortgages>

**Link for the M & T reverse video only:**

<https://www.mtb.com/mortgages-loans/mortgages/reverse-mortgages/reverse-mortgage-right-for-me>

"If you choose not to receive e-mail from M&T Bank, or its affiliates, please let me know by responding to this e-mail or notifying me in writing at the address listed above"

# Exhibit Subject to M&T's Motion to Seal

# **EXHIBIT F**

Document Name	Creator	LastModifiedBy	Created	Modified	Company
Copy of June Chairmans Club - Reverse.xls	EMTGKJS (Sielski, Kenneth)	Saraceni, Christine	2012-07-25T15:33:40Z	2019-07-25T14:39:35Z	M&T Bank
Top firms Database for Mail merging--Use this one.xlsx	EMTGRD2 (Deveronica, Ruth)	EMTGCSX (Saraceni, Christine)	2010-01-22T14:04:11Z	2010-08-18T20:26:27Z	M&T Bank

Entry Name	Author	Last Saved By	Create Date	Last Revised Date	Company
Marketing List.xls	M&T Bank Corporation	M&T Bank Corporation	7/9/2008 19:56	8/5/2008 14:00	M&T Bank Corporation
address.doc	M&T Bank Corporation	M&T Bank Corporation	12/13/2008 12:55	12/13/2008 15:03	M&T Bank Corporation